

**Filed**  
NOV 20 2014  
Benton County Circuit Court  
Benton County, Oregon  
Entered

**IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF BENTON**

**STATE OF OREGON,**

Plaintiff,

v.

**WALEED ALI ALHARTHI,**

Defendant.

**CASE No. 14CR16191**

**DEFENDANT'S MOTION TO  
AMEND CONDITIONS OF  
RELEASE**

COMES NOW, Defendant Waleed Ali Alharthi, by and through his attorney of record, Ginger G. Mooney, and submits this motion and proposed order to amend the conditions of Defendant's release as follows:

1. That Defendant be permitted to travel to the State of Washington to participate in testing relevant to his defense on November 20, 2014 for approximately five hours.

Counsel for Defendant has conferred with counsel for the State, Carrie Wineland, and the State does not object to this Motion. Defendant makes this motion based upon the grounds referenced herein and set forth in the attached Declaration of Ginger G. Mooney.

DATED: This the 20th day of November, 2014.

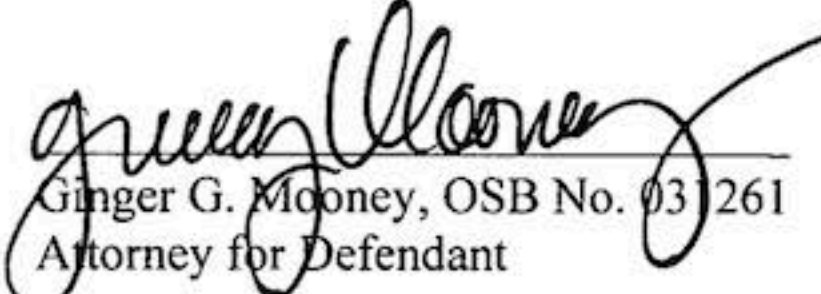
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Respectfully submitted,  
VAN NESS, MOONEY LLC

  
Ginger G. Mooney, OSB No. 031261  
Attorney for Defendant

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**WALEED ALI ALHARTHI,**

Defendant.

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**DECLARATION OF GINGER G.  
MOONEY**

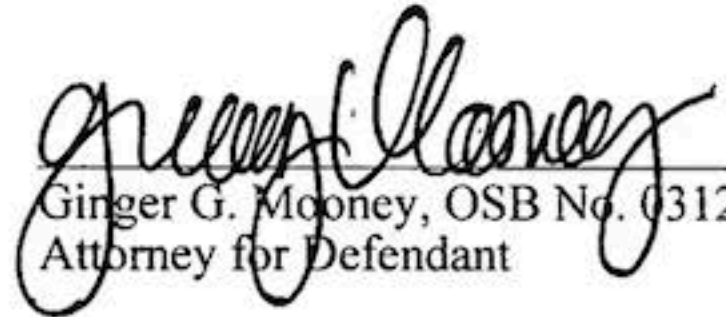
I, Ginger G. Mooney, declare that the following facts are true and correct to the best of my knowledge and belief:

1. I am the attorney retained to represent the Defendant, Waleed Ali Alharthi, in the above-captioned proceeding.
2. I have conferred with opposing counsel, Carrie Wineland, who has indicated that the State does not object to this Motion.
3. Travel to Washington is required for Defendant to take part in testing relevant to his defense in the present case.
4. I am requesting Defendant's release conditions be amended to permit travel to Washington on November 20, 2014 for approximately five hours.
5. This motion is made in good faith and not for purposes of delay.

1 Pursuant to ORCP 1E, I hereby declare that the above statement is true to the best of my  
2 knowledge and belief, and that I understand it is made for use as evidence in court and is subject  
3 to penalty for perjury.

4 DATED this 20th day of November 2014.

5 VAN NESS, MOONEY LLC

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8 Ginger G. Mooney, OSB No. 031261  
9 Attorney for Defendant  
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